

EXHIBIT 4

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December 12, 2011

Georgia Pacific Consumer Products LP, et al. v. NCR Corp., et al.

Dear Doug:

This responds to your November 4, 2011 letter, in which you propose that the parties agree to a protocol for handling document repositories that may be unduly burdensome to search. To this end, NCR identifies the following collections of NCR documents that would be unduly burdensome to search:

- Files of NCR's outside counsel, including Cravath, Swaine & Moore LLP; Sidley Austin LLP; Marten Law PLLC; Gass Weber Mullins LLC; and Covington & Burling LLP;
- Active NCR in-house legal and technical files relating to the Fox and Kalamazoo Rivers, which are maintained at NCR headquarters in Duluth, Georgia, NCR's offices in New York City, and in NCR's off-site document storage facility. Note, however, that NCR has searched and produced/logged relevant documents from its historical legal files (e.g., legal files from the late 1960s and 1970s);
- Files of outside consultants retained by or on behalf of NCR to serve as consulting and/or testifying expert witnesses in connection with, or in anticipation of, litigation relating to carbonless copy paper.

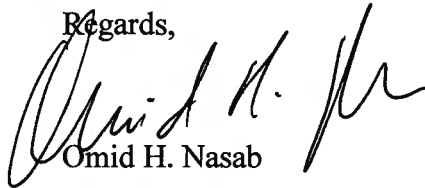
These document sources contain (or are almost certain to contain) only documents that fall into two categories: (1) documents that have been already produced in this litigation; or (2) documents that are protected from disclosure by the attorney-client privilege or work product immunity. Searching these sources—such as the legal files of the outside law firms currently representing NCR in this lawsuit—would be unusual and unduly burdensome.

To be clear, however, NCR has produced to the parties in this case a complete set of the documents it has produced in the *Whiting* litigation. To the extent any party in this case does not have access to the other documents produced in the *Whiting* litigation, or to pleadings and/or deposition testimony from the *Whiting* litigation, NCR can promptly make those materials available.

NCR expects the other parties to do the same with respect to analogous collections of documents from related litigation. In particular, NCR has repeatedly requested since the beginning of fact discovery that Georgia-Pacific produce a complete set of the KRSB Litigation Materials. Unlike Georgia-Pacific, who is a party to the *Whiting* litigation and has access to all the materials from that case, NCR was *not* a party to the KRSB litigation. The only way for NCR to have access to the KRSB Litigation Materials, which are highly relevant to NCR's defense against Georgia Pacific's allegations, is for Georgia-Pacific to produce them. Yet our understanding to date is that NCR still has not been provided a complete set of such documents. Such materials should be neither privileged nor unduly burdensome to locate, and should have already been produced. To the extent there is further delay in the production of a complete set of such materials, an extension of the fact discovery deadline will be needed.

We are available at your convenience to discuss the above issues, as well the other document production issues that remain open. Please let us know a time that works for you and the other parties.

Regards,



Omid H. Nasab

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